

JAMES E. GIBBONS (*pro hac vice*)  
Cal. State Bar No. 130631  
**MANNING & KASS  
ELLROD, RAMIREZ, TRESTER LLP**  
801 South Figueroa Street, 15th Floor  
Los Angeles, CA 90017  
Tel. (213) 624-6900  
jeg@manningllp.com

ROBERT W. COHEN (*pro hac vice*)  
Cal. State Bar No. 150310  
MARIKO TAENAKA (*pro hac vice*)  
Cal. State Bar No. 273895  
**LAW OFFICES OF ROBERT W. COHEN, A.P.C.**  
1875 Century Park East, Suite 1770  
Los Angeles, CA 90067  
Tel. (310) 282-7586  
rwc@robertwcohenlaw.com  
mt@robertwcohenlaw.com

*Attorneys for Plaintiffs*

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

SHIGE TAKIGUCHI, FUMI NONAKA,  
MITSUAKI TAKITA, KAORUKO KOIZUMI,  
TATSURO SAKAI, SHIZUKO ISHIMORI, YOKO  
HATANO, YUKO NAKAMURA, HIDEHITO  
MIURA, YOSHIKO TAZAKI, MASA AKI  
MORIYA, HATSUNE HATANO, SATORU  
MORIYA, HIDENAO TAKAMA, SHIGERU  
KURISU, SAKA ONO, KAZUHIRO  
MATSUMOTO, KAYA HATANAKA, HIROKA  
YAMAJIRI, KIYOHARU YAMAMOTO, JUNKO  
YAMAMOTO, KOICHI INOUE, AKIKO NARUSE,  
TOSHIMASA NOMURA, and RITSU YURIKUSA,  
individually and on behalf of all others similarity  
situated,

Plaintiff,

v.

MRI INTERNATIONAL, INC., EDWIN J.  
FUJINAGA, JUNZO SUZUKI, PAUL MUSASHI  
SUZUKI, LVT, INC., dba STERLING ESCROW,  
and DOES 1-500,

Defendants.

Case No.: 2:13-cv-01183-HDM-VCF

**~~STIPULATION AND PROPOSED~~  
ORDER FOR EXTENSION OF  
TIME FOR DEFENDANT EDWIN  
FUJINAGA TO OPPOSE  
PLAINTIFFS' MOTION TO  
COMPEL**

1 On February 2, 2016, Plaintiffs filed their Motion to Compel Deposition of Defendant Edwin  
2 Fujinaga. Dkt. No. 358. Defendant's opposition brief is due February 19, 2015. The parties have agreed  
3 that Defendant shall have an additional fourteen (14) days to file their reply brief.

4 The parties hereto stipulate and agree as follows:

5 1. Defendant Edwin Fujinaga shall have until March 4, 2016 to file his reply brief.

6 Respectfully submitted.

7 Dated: February 8, 2016

MANNING & KASS  
ELLROD, RAMIREZ, TRESTER LLP


9 By: /s/ James Gibbons  
JAMES E. GIBBONS  
STEVEN J. RENICK

11 HITZKE & ASSOCIATES

13 By: /s/ Erick Ferran  
ERICK FERRAN  
Attorneys for Defendants MRI International,  
15 Inc. and Edwin Y. Fujinaga

16 PURSUANT TO STIPULATION, IT IS SO ORDERED.

18 DATED: 2-8-2016

17   
\_\_\_\_\_  
20 Hon. Cam Ferenbach  
United States District Judge

**CERTIFICATE OF SERVICE**

I hereby certify that on February 8, 2016, a copy of the foregoing document was filed electronically via the Court's CM/ECF system. Pursuant to Local Rule 5.5(h), notice of filing will be served on all parties by operation of the Court's CM/ECF system, and parties may access this filing through the Court's CM/ECF system.

/s/ Mariko Taenaka  
Mariko Taenaka